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Reply To  
Attn Of: AT-083

2-1-95

WA 7152  
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2/1/1995

**CERTIFIED MAIL and FACSIMILE**

Mr. J. Stephan Banchemo, Jr.  
President, Northwest EnviroService  
1700 Airport Way South  
Seattle, WA 98134

Dear Mr. Banchemo:

We have received a copy of your December 29, 1994, Interim Closure Plan for the Northwest EnviroService, Inc. (NWES) facility, WAD 058367152. As discussed with Jerry Bartlett of your staff, it will be mutually beneficial to close all areas that have had possible contact with polychlorinated biphenyl (PCB) waste using closure procedures independent from those identified in the Resource Conservation and Recovery Act (RCRA) plan. In this regard, we are requesting you to submit a Toxic Substances Control Act (TSCA) closure implementation plan within 30 days that incorporates the steps identified in the existing TSCA closure plan and that addresses the TSCA closure procedures identified in 40 C.F.R. § 761.65(e)(6) for commercial storers of PCB waste.

Closure activities which should be incorporated into the closure implementation plan include the following:

1. Notification provided to the Regional Administrator in writing at least 60 days prior to the date on which final closure of NWES's PCB storage facility is expected to begin. We will accept your December 29, 1994, closure plan submitted to RCRA as fulfilling this requirement.
2. Commencement of closure no later than 30 days after the date on which NWES receives its final quantities of PCB waste. The following should be included:
  - a. The expected date of commencement of closure.
  - b. An inventory of all PCB waste stored at the facility at the beginning of closure.
  - c. A detailed description of the methods or arrangements to be used during closure for removing, transporting, storing, or disposing of NWES's

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inventory of PCB waste, including an identification of any off-site facilities that will be used.

3. **Removal of all PCB waste in storage at the facility within 90 days after receiving the final quantity of PCB waste for storage. The following should be included:**
  - a. **The expected date of completion of PCB waste removal.**
  - b. **Copies of all manifests for PCB wastes transported off site which were identified in the beginning inventory.**
4. **Completion of closure activities in accordance with the approved closure plan and within 180 days after receiving the final quantity of PCB waste for storage at the facility. The expected date of completion of closure activities in the closure implementation schedule should be included.**

The closure implementation plan should also include the following.

- a. **A schedule for closure of each area where PCB waste was stored or handled, including the total time required to close each area of PCB waste storage or handling, and the time required for any intervening closure activities. For areas that have dual RCRA/TSCA waste, just specify the activities necessary to ensure closure for TSCA.**
- b. **A description of all areas of PCB storage and areas of possible PCB contact (roadways and transfer sites). At a minimum, this should include the PCB storage area, the container staging area, the container storage area, the PCB loading/off loading area, and the sole-use concrete roadway.**
- c. **A description of how the PCB storage areas (including the dual RCRA/TSCA areas) of the facility will be closed in a manner that eliminates the potential for post-closure releases of the PCBs into the environment.**
- d. **A detailed description of the steps needed to remove PCB waste residues and contaminated containment system components, equipment, structures, and soils during closure in accordance with the disposal requirements of Subpart D or, if applicable, decontaminated in accordance with the levels specified in the PCB Spills Cleanup Policy in subpart G of 40 C.F.R. §761, including a description of the methods for sampling and testing of**

surrounding surfaces or soils, and the criteria for determining the extent of removal or decontamination. Also, when PCB waste is removed from the storage facility during closure, NWES becomes a generator of PCB waste subject to the generator requirements of Subpart J.

The following cleanup standards will apply:

- 10  $\mu\text{g}/100 \text{ cm}^2$  (as measured by standard wipe tests) for solid surfaces; and
  - 10 ppm PCBs by weight for soil that has been excavated to a minimum of 10 inches (excavated soil shall be replaced with clean, less than 1 ppm PCBs), assuming soil sampling, and subsequent soil remediation, is required.
- e. A sampling scheme developed pursuant to the sampling requirements of 40 C.F.R. § 761.130.
- i. NWES may use any statistically valid, reproducible, sampling scheme (either random samples or grid samples).
  - ii. The sampling scheme must ensure 95 percent confidence against false positives and must include calculation for expected variability due to analytical error.
  - iii. Sample collection locations shall be based on a hexagonal grid system similar to the one employed in the document "Field Manual for Grid Sampling of PCB Sites to Verify Cleanup" (EPA-560/5-86-017). (Sample locations in any dual RCRA/TSCA areas can be incorporated into the RCRA closure plan.)
- f. A detailed description of other activities necessary during the closure period to ensure that any post-closure releases of PCBs will not present unreasonable risks to human health or the environment. This includes activities such as groundwater monitoring, run-on and run-off control, and facility security.

Within 60 days of completion of closure NWES must submit to EPA Region 10's Regional Administrator, Chuck Clarke, by registered mail, a certification that the PCB storage facility has been closed in accordance with the approved closure plan.

- a. The certification must be signed by the owner or operator of NWES and by an independent registered professional engineer.
- b. The certification package must include all sampling plans, sample descriptions, and analytical results.

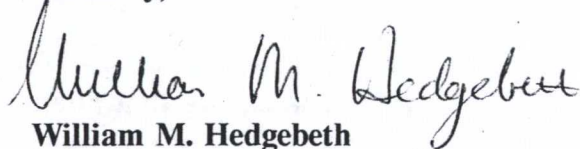
**Release of owner or operator:** Within 60 days after receiving certifications from the owner or operator of NWES and an independent registered professional engineer that final closure has been completed in accordance with the approved closure plan, the Regional Administrator will notify the owner or operator of NWES in writing that NWES is no longer required by this section to maintain financial assurance for the PCB portion of final closure of the facility, unless the Regional Administrator has reason to believe that final closure has not been completed in accordance with the approved closure plan. The Regional Administrator shall provide the owner or operator of NWES with a detailed written statement stating the reasons why he believed closure was not conducted in accordance with the approved closure plan.

All reports, notifications, or other materials that are required to be submitted to the EPA Regional Administrator should be submitted to the Director of the Air and Toxics Division, the duly delegated representative of the EPA Region 10 Regional Administrator in this matter, at

Director, Air and Toxics Division  
U. S. EPA Region 10  
1200 6th Avenue, M/S AT-081  
Seattle, WA 98101.

If you or your staff have any questions, please call Christina Colt at 553-8577.

Sincerely,



William M. Hedgebeth  
PCB Team Leader  
Toxic Substances Section

cc: Kevin Schanilec, HW-104  
Christina Colt  
Gil Haselberger